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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

BRIAN TASH and PETER HAHN, on behalf
of themselves and all others similarly situated,

Plaintiffs,
v.

VISION SERVICE PLAN a/k/a VSP
GLOBAL, VSP VENTURES, LLC, VSP
VENTURES MANAGEMENT SERVICES,
LLC, and VSP VENTURES OPTOMETRIC
SOLUTIONS, LLC,

Defendants.

CASE 2:25-CV-00762-DJC-JDP

**STIPULATED REQUEST FOR ORDER
EXTENDING PLAINTIFFS' DEADLINE TO
RESPOND TO DEFENDANTS' MOTION TO
DISMISS THE CONSOLIDATED COMPLAINT
AND DEFENDANTS' DEADLINE TO FILE
THEIR REPLY; ORDER**

Assigned to: Judge Daniel J. Calabretta

Pursuant to Fed. R. Civ. P. 6(b)(1), Local Rule 144(a), and section IV of the Court's Standing Order (ECF No. 3-1), plaintiffs Brian Tash ("Tash"), Peter Hahn ("Hahn"), and Defendants Vision Service Plan, VSP Ventures, LLC, VSP Ventures Management Services, LLC, and VSP Ventures Optometric Solutions, LLC ("Defendants") (collectively, the "Parties"), by and through their respective counsel, stipulate and request that the Court enter an order: (1) extending Plaintiffs' deadline to file their responses in opposition to Defendants' Motion to Dismiss the Consolidated Class Action Complaint and concurrently filed Request for Judicial Notice ("Motion to Dismiss") until November 6, 2025; and (2) extending Defendants' deadline to file their reply in support of the Motion to Dismiss until December 3, 2025. In support of this stipulated request, the Parties state as follows:

On July 14, 2025, the Court granted the Parties' Amended Stipulated Request to Consolidate and Set Related Deadlines. ECF No. 21.

Plaintiffs filed their Consolidated Class Action Complaint on August 28, 2025. ECF No. 33.

Defendants filed their Motion to Dismiss on October 6, 2025. ECF No. 34 and 35.

At present, Plaintiffs' response is due by October 20, 2025, and Defendants' reply is due by October 30, 2025. Local Rule 230(c)-(d).

Federal Rule of Civil Procedure 6(b)(1) allows the Court to extend deadlines for good cause shown. The Parties agree that good cause exists here based on the complex nature of the litigation. The proposed stipulations and extensions are not sought to unduly delay the proceedings, will not prejudice any Party, and are requested to allow the Parties additional time to investigate their respective claims and defenses. Additionally, under the proposed modified schedule, the Parties' briefs will still be filed approximately two weeks prior to the Court's hearing on the Motion to Dismiss, which is currently set for December 18, 2025.

For these reasons, the Parties jointly stipulate and request that the Court extend the Parties' briefing deadlines on Defendants' Motion to Dismiss the Consolidated Class Action Complaint as follows:

Deadline for Plaintiffs to file their Opposition to Defendants' Motion to Dismiss	November 6, 2025
Deadline for Defendants to file their reply brief	December 3, 2025

The Parties respectfully request that this Stipulation be granted by signing the accompanying

1 proposed order.

2
3 Dated: October 15, 2025

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ORDER

The Court, having considered the stipulation between Plaintiffs Brian Tash and Peter Hahn and Defendants Vision Service Plan, VSP Ventures, LLC, VSP Ventures Management Services, LLC, and VSP Ventures Optometric Solutions, LLC (“Defendants”), and for good cause shown, HEREBY ORDERS that:

1. Plaintiffs shall file their response in opposition to Defendants’ Motion to Dismiss on or before November 6, 2025.
2. Defendants shall file their reply in support of their Motion to Dismiss on or before December 3, 2025.

IT IS SO ORDERED.

Dated: October 15, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE